

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

IN THE MATTER OF:

CASE NO. 20-10055

MARIA ALICIA KUYKENDALL

DEBTOR

CHAPTER 13

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO THE HONORABLE BANKRUPTCY JUDGE:

NOW COMES Hays County, hereinafter referred to as Claimant, and files its Objection to the Confirmation of Chapter 13 plan, on the following grounds:

1. The amount provided for this Claimant is unacceptable in that the full amount owed to this Claimant as reflected in its proof of claim is \$16,277.71.
2. As a secured creditor, this Claimant is entitled to interest under this Plan at the rate of 12% per annum (11 U.S.C. § 506(b)).
3. Clarification of the Plan is necessary in that the amount provided for this Claimant per se should be separated from the other taxing jurisdictions in order for Claimant to determine whether it is properly provided for in the Plan.

This claim arises from property taxes due for the tax years 2018-20 estimated on the debtor's property described as located in this tax jurisdiction.

WHEREFORE, Hays County objects to confirmation of the Plan due to noncompliance with the provisions of § 1325(b)(1) and (2)(A) of the Bankruptcy Code, and further requests other and such relief as is just and proper.

Dated: April 9, 2020

Respectfully submitted,

MCCREARY, VESELKA, BRAGG & ALLEN, P.C.  
Attorneys for Claimant, Hays County

/s/Tara LeDay

Tara LeDay

State Bar Number 24106701

P.O. Box 1269

Round Rock, Texas 78680

Telephone: (512) 323-3200

Fax: (512) 323-3205

Email: tleday@mvbalaw.com

CERTIFICATE OF SERVICE

I hereby certify that I have placed a copy of the above Objection to Confirmation of Chapter 13 Plan to Della J. Durham, The Law Office of Della J. Durham. P.C., PO Box 3695, Abilene, Texas 79604; Robert B. Wilson, 1407 Buddy Holly Ave, Lubbock, Texas 79401, and to those parties listed on the Court's Notice of Electronic Filing on April 9, 2020, by Electronic Notification.

/s/Tara LeDay

Tara LeDay